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Formed in the State of PA
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON DIVISION**

IN RE:	:	CHAPTER 11
COASTAL CONSTRUCTION GROUP,	:	
LLC	:	
	:	BANKRUPTCY NO. 24-15203(MDK)
Debtor	:	
	:	
	:	Hearing Date: November 7, 2024 at 10:00 a.m.
	:	

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE
WITH LOCAL RULES OF BANKRUPTCY PRACTICE**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the Movant has a perfected security interest in the motor vehicle owned by the Debtor Coastal Construction Group, LLC and there has been a default.

As the facts the Movant relies upon, as set forth on the accompanying Certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO

DATED: October 16, 2024

/s/ REGINA COHEN

Regina Cohen, Esquire
Attorney for Ally Capital